

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Robert N. Michaelson, as Trustee of the)	
Appleseed's Litigation Trust,)	
)	Civil Action No. 11-807 JEI
Plaintiff,)	
v.)	
)	
Jeffrey D. Farmer, et al.,)	
)	
Defendants.)	Bankruptcy Case No. 11-10160 KG
)	ADV. Pro. 11-51847 KG

MOTION AND ORDER FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission *pro hac vice* of Robert J. Moore of Milbank, Tweed, Hadley & McCloy LLP, 601 South Figueroa Street, 30th Floor, Los Angeles, California 90017, to represent Golden Gate Private Equity, Inc.; Golden Gate Capital Management II, LLC; GGC Administration, LLC; Orchard Brands Corporation (formally known as Appleseed's Topco, Inc.); Orchard Brands Topco LLC; Catalog Holdings, LLC; Catalog Holdings, LLC – Series B (Draper's); Catalog Holdings, LLC – Series C (Appleseed's); Catalog Holdings, LLC – Series D (NTO); Catalog Holdings, LLC – Series E (Haband); Golden Gate Capital Investment Fund II, LP; Golden Gate Capital Investment Fund II (AI), LP; Golden Gate Capital Associates II-QP, LLC; Golden Gate Capital Associates II-AI, LLC; CCG AV, LLC; CCG AV, LLC – Series C (GGC Co-Invest); CCG AV, LLC – Series I (Bain); CCG AV, LLC – Series K (K&E); CCG AV, LLC – Series K; Joshua Olshansky, Stefan Kaluzny, Geralynn Madonna and Jim Brewster (the "Golden Gate Defendants"), in this matter.

Signed: _____


Mark D. Collins (No. 2981)
Robert J. Stearn, Jr. (No. 2915)
Drew G. Sloan (No. 5069)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
920 North King Street
Wilmington, Delaware 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
Email: collins@rlf.com
stearn@rlf.com
sloan@rlf.com

Attorney for: Golden Gate Defendants

Dated: October 14, 2011

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.

Date: _____

The Honorable Joseph E. Irenas
United States District Judge

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of California and the District of Columbia and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective July 23, 2009, I further certify that the annual fee of \$25.00 has been previously paid to the Clerk of Court for District Court in connection with my pro hac vice admission to the United States Bankruptcy Court for the District of Delaware.

Signed: Robert J. Moore

Date: October 10, 2011

Robert J. Moore
Milbank, Tweed, Hadley & McCloy LLP
601 South Figueroa Street
30th Floor
Los Angeles, California 90017
Telephone: (213) 892-4501
Email: rmoore@milbank.com